

DRAFT Construction Stormwater (CSW) & Industrial Stormwater Coverage (ISW) – July 24, 2017**Construction Stormwater Prior to Operations:**

- NPDES Permit coverage under the Minnesota Construction Stormwater (CSW) General Permit (MN R1000001) for stormwater generated from NorthMet construction prior to initiation of mining operations and operation of the WWTF.
- Separate CSW General Permit coverages are expected for separate portions of the NorthMet project area:
 - Mine Site
 - Plant Site (Processing Areas)
 - Tailings Basin
 - Transportation & Utility Corridor
- Each of these areas will have separate Stormwater Pollution Prevention Plans (SWPPPs) under their respective permit coverages.

Construction Stormwater During Operations:

- Construction activities in some areas may be ongoing for a number of years. Examples include:
 - Stockpile/foundation construction
 - Tailings Basin dam lifts
- Where stormwater from construction activities is routed to the WWTF authorized by the NorthMet individual NPDES/SDS permit, separate construction stormwater coverage is not required. Examples include:
 - Construction of the north Tailings Basin dams (where stormwater is captured by the seepage collection system)
 - Dewatering water related to mine pit excavation
 - Dewatering during buildout of the Cat. 1 Stockpile GW Containment System (where water is captured as construction mine water)
- Trigger event will be added to the NorthMet NPDES/SDS Permit to terminate coverage for each CSW General Permit. Trigger event for the Transportation & Utility Corridor will likely be different from the Mine, Plant and Tailings Basin areas.
- After trigger event occurs, coverage under CSW General Permit terminates and coverage under ISW General Permit begins.
- As construction of the site is completed or as construction areas are revegetated/stabilized, stormwater runoff from these former construction areas will either be permitted as industrial stormwater covered under the Minnesota Industrial Stormwater General Permit or will be treated as non-contact stormwater (which does not require permit coverage)
- If CSW water goes to existing control structure (i.e. treatment works), CSW is covered under the NPDES permitted discharges. Under the NPDES Permit, the Permittee will be required to apply

for coverage under the CSW General Permit (including new SWPPPs) for any additional construction activities not covered under the NPDES permitted discharges.

- There will not be any gaps in permit coverage between the CSW and ISW permits

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Industrial Stormwater Permitting

- The Company is proposing to apply for Industrial Stormwater permit coverage under the Minnesota Industrial Stormwater (ISW) Multi-Sector General Permit MN R050000 for the following areas:
 - Mine Site
 - Transportation & Utility Corridors
 - Plant Site
- For the purposes of industrial stormwater permitting, the NorthMet project area will be addressed as three permitted areas: the Mine Site, the Transportation and Utility Corridor and the Plant Site because they have:
 - Geographically separate and distinct areas (i.e., the Mine Site is 6-8 miles separated from the Plant Site)
 - Different receiving waters for industrial stormwater runoff
 - Different applicable stormwater sectors
- The following table is a summary of NorthMet project areas with a potential to discharge industrial stormwater that will not be routed, directly or indirectly, to the NorthMet wastewater treatment system (WWTS).

Summary of Areas with Potential to Discharge Industrial Stormwater

	Mine Site	Transportation & Utility Corridors	Plant Site
Applicable MN ISW General Permit Sector(s)	G1 , G2	P	G1
Areas Existing Pre 1988	11.7 acres	45.3 acres	227.9 acres
Total Project Construction	20.2 acres	2.0 acres	61.2 acres
Total Area	31.9 acres	47.3 acres	289.1 acres
Significant Discharge	No	No	No
Proposed ISW Permit Coverage	General	General	General

- The NPDES/SDS permit will not incorporate ISW permit coverage. All ISW discharges for the 3 areas of the project will be covered under the ISW General Permit.
- If ISW goes to an existing control structure (i.e. treatment works), ISW is covered under the NPDES permitted discharges.